

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DANIEL KASPRZAK,

Plaintiff,

-vs-

CASE NO. 2:12-cv-12140
HON. ARTHUR J. TARNOW
MAG. R. STEVEN WHALEN

ALLSTATE INSURANCE COMPANY,

Defendant.

CHRISTOPHER TRAINOR & ASSOCIATES CHRISTOPHER J. TRAINOR (P42449) AMY J. DEROUIN (P70514) Attorneys for Plaintiff 9750 Highland Road White Lake, MI 48386 (248) 886-8650	VANDEVEER GARZIA, P.C. DONALD C. BROWNELL (P48848) Attorney for Defendant 1450 W. Long Lake Road, Ste. 100 Troy, MI 48098-6330 248-312-2800 248-267-1242-fax
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PLAINTIFF'S PRELIMINARY WITNESS LIST

NOW COMES Plaintiff, **DANIEL KASPRZAK**, by and through his attorneys, CHRISTOPHER TRAINOR & ASSOCIATES, and for his Preliminary Witness List discloses the following witnesses, who may be relied upon for testimony at the time of trial in this matter:

1. Daniel Kasprzak, c/o Plaintiff's Counsel
2. Any and all Attendant Care or Replacement Services providers, including but not limited to:
 - a. Karen Kasprzak, c/o Plaintiff's Counsel
 - b. Randy Currie
3. Any drivers and/or all passengers involved in the accident on May 10, 2011, including but not limited to, the following:
 - a. Anyonio Jarve Moreno
4. Any and all witnesses to the accident on May 10, 2011.

5. Any and all employees, agents, representatives, and custodian or records from the Royal Oak Police Department, including but not limited to:
 - a. Officer B. Zelakincz
 - b. Any persons and or officers who responded to or investigated the accident at issue.
6. Any and all employees, agents, representatives, and custodian of records from Allstate Insurance Company, including but not limited to:
 - a. Greg Bahorski;
 - b. Debra Burns;
 - c. Jan Mainella;
 - d. Any and all claims adjusters or any other employees that have attended to Plaintiff's claim for benefits.
7. Any and all employees, agents, representatives, administrative staff, records custodians, surgeons, physicians, physician's assistants, radiologists, nurses, nurses' aides, counselors, billing clerks, and therapists, and/or other named individuals of Plaintiff's medical treatment providers and of the following:
 - a. Be Well of Birmingham
750 S. Old Woodward Avenue
Birmingham, MI 48009
i. Dr. Cozetto
 - b. Clear Imaging
907 S. Main Street
Royal Oak, MI 48067
 - c. Doctor's Hospital of Michigan
461 W. Huron
Pontiac, MI 48340
 - d. Dr. Gonte
29877 Telegraph, Ste. 401
Southfield, MI 48034
 - e. Dr. Sabit
29355 N.W. Ste. 130
Southfield, MI 48034
 - f. HealthQuest of Southfield

26751 Southfield Rd., Lathrup Village
Southfield, MI 48076

- g. MI Spine and Rehab
23861 W. McNichols
Detroit, MI 48219
 - a. Dr. Tolia
- h. MI Brain and Spine
16100 19 Mile, Ste. 200
Clinton Twp., MI 48038
 - a. Dr. Sabit
- i. Rehabilitation Medicine Group
20307 W. 12 Mile Road
Southfield, MI 48076
 - a. Dr. Weingarden
- j. Universal Health Group
5761 W. Maple Road
West Bloomfield, MI 48322
- k. Mendelson & Kornblum Orthopedics
11900 East 12 Mile Road, #110
Warren, MI 48093

8. Any and all employees, agents, representatives, and custodians of records for:

- a. A to Z Transportation
24415 Graham Rd.
Redford, MI 48239
- b. Daring Drugs-Adv.
23077 Greenfield
Southfield, MI 48075
- c. Social Security Administration

9. Any and all IME doctors.

10. Any witnesses identified on Defendant's Witness List.

11. Any persons or companies who conducted surveillance on Plaintiff on behalf of Defendant.

12. All persons whose testimony is required to admit and/or authenticate evidence.

13. All persons deposed.
14. All persons identified in the discovery process, including interrogatories, depositions, pleadings, and documents from all parties.
15. All persons or entities named by other parties to this lawsuit whether or not called at the time of trial.
16. Any and all witnesses called for the purpose of rebuttal against any of Defendant's witnesses.
17. Plaintiff reserves the right to amend and/or supplement this Witness List as discovery is ongoing.

EXPERT WITNESS LIST

1. Plaintiff's treating doctors, before and after the accident at issue.
2. Experts, the necessity of which, are revealed by further discovery.

/s/**Amy J. DeRouin**
CHRISTOPHER J. TRAINOR (P42449)
AMY J. DEROUIN (P70514)
Attorneys for Plaintiff
9750 Highland Road
White Lake, MI 48386
(248) 886-8650
Amy.derouin@cjtrainor.com

Dated: August 22, 2012

CJT/ajd

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2012, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record, and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: **None**.

s/ Amy J. DeRouin (P70514)
Christopher Trainor & Associates
9750 Highland Road
White Lake, MI 48386
(248) 886-8650
Amy.derouin@cjtrainor.com